

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INTERNATIONAL BUSINESS MACHINES)
CORPORATION,)
Plaintiff,)
v.) C.A. No. 22-00590-VAC
ZYNGA INC., and CHARTBOOST, INC.,)
Defendants.)

**DEFENDANTS' PARTIAL MOTION TO DISMISS COMPLAINT
PURSUANT TO FED. R. CIV. P. 12(B)(6) AND 35 U.S.C. § 101**

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure and 35 U.S.C. § 101

Defendants Zynga Inc. and Chartboost, Inc. move to partially dismiss with prejudice Count Four of Plaintiff International Business Machines Corporation's Complaint (D.I. 1). Defendants' motion relies on the pleadings and its opening brief, filed contemporaneously herewith.

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